

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY and
20 LAND TITLE OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 PNC BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:22-CV-00301-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

29 COMES NOW defendants Fidelity National Title Insurance Company (“Fidelity”) and
30 Land Title of Nevada, Inc. (“Land Title”) (collectively “Defendants”) and plaintiff PNC Bank,
31 N.A. (“PNC”), by and through their respective attorneys of record, which hereby agree and
32 stipulate as follows:

1 1. On February 17, 2022, PNC filed its complaint in the Eighth Judicial District Court
2 for the State of Nevada;

3 2. On February 17, 2022, Fidelity removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Fidelity and Land Title's respective responses to PNC's complaint are currently
6 due on March 22, 2022;

7 4. Counsel for Defendants request a 30-day extension of Defendants' respective
8 deadlines to respond to PNC's complaint, through and including Thursday, April 21, 2022 to
9 afford Defendants' counsel additional time to review and respond to PNC's complaint.

10 5. Counsel for PNC does not oppose the requested extension;

11 6. This is the first request for an extension made by counsel for Defendants, which is
12 made in good faith and not for the purposes of delay.

13 7. This stipulation is entered into without waiving any of Defendants' objections
14 under Fed. R. Civ. P. 12.

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Thursday, April 21, 2022.

3 Dated: March 20, 2022

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE INSURANCE
8 COMPANY and LAND TITLE OF
9 NEVADA, INC.

10 Dated: March 20, 2022

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON

Attorneys for Plaintiff

PNC BANK, N.A.

13 **IT IS SO ORDERED.**

14 Dated March 21, 2022.

15
16 
17 NANCY J. KOPPE
18 UNITED STATES MAGISTRATE JUDGE
19
20
21
22
23
24
25
26
27
28